

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: § **Chapter 7**
WITH PURPOSE, INC. § **Case No. 23-30246-MVL-7**
Debtor. §

**JOINDER TO OBJECTION TO AMENDED MOTION TO CONVERT
BANKRUPTCY CASE TO CHAPTER 11**

Creditors Ayers Family Holdings, LLC and the J. Nicholas Ayers 2021 Irrevocable Trust (collectively, the “Ayers Parties”) file this Joinder to the Jackson Investment Group, LLC’s Objection to Amended Motion to Convert Bankruptcy Case to Chapter 11 Pursuant to Section 706(a) of the Bankruptcy Code (ECF No. 312) (the “Objection”). Counsel for the Ayers Parties reserves the right to present argument and evidence in support of the Objection during the hearing on the Amended Motion to Convert.

Respectfully submitted,

/s/ Chase J. Potter
CHASE J. POTTER
Texas Bar No. 24088245
E-Mail: potter@imcplaw.com

IACUONE MCALLISTER POTTER PLLC
Energy Square One
4925 Greenville Ave., Suite 700
Dallas, Texas 75206
Telephone: (214) 432-1536

ATTORNEYS FOR THE AYERS PARTIES

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was served on all counsel of record via the Court's ECF system on this 18th day of September, 2024.

/s/ Chase J. Potter
CHASE J. POTTER